Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, 8

FILED
11/6/2024 12:00 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2019L005521
Calendar, 8
30072359

FILED DATE: 11/6/2024 12:00 AM 2019L005521

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**
**COUNTY DEPARTMENT, LAW DIVISION**

| | | |
|---|---|---|
| ROBERT GOLDBERG, DDS, | ) | |
| | ) | Case No. 2019 L 005521 |
| Plaintiff, | ) | |
| | ) | (Transferred to Chancery) |
| v. | ) | |
| | ) | Honorable Michael T. Mullen |
| MARY KATHERINE ALBERTI, | ) | |
| | ) | |
| Defendant. | ) | |

**DEFENDANT'S FIRST SET OF REQUEST FOR ADMISSIONS FOR PLAINTIFF**

Defendant, Mary Katherine Alberti ("Alberti"), by and through her attorneys, Tressler LLP, pursuant to Illinois Supreme Court Rule 216, requests Plaintiff Robert Goldberg, DDS ("Goldberg") to admit, under oath, the truth of the following facts within twenty-eight (28) days of the date of service of this request. **WARNING: If you fail to serve the response required by Rule 216 within twenty-eight (28) days after you are served with this paper, all the facts set forth in the requests will be deemed as true and all the documents described in the requests will be deemed as genuine.**

**REQUESTS TO ADMIT**

1. The root canal that Plaintiff performed on Alberti's tooth #3 failed.

2. Plaintiff's 8/7/2018 scan shows rapid periodontal breakdown that was not relayed to Alberti.

3. Alberti's tooth #3 has a root fracture.

4. Plaintiff disclosed Alberti's patient private health information.

5. Plaintiff violated HIPAA.

6. Plaintiff violated Illinois state privacy regulations.

7. Plaintiff relayed to Alberti and Senator Laura Murphy that there were no patient files

EXHIBIT
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contained in Plaintiff's online system for which Alberti received credentials.

8. Plaintiff was informed by Alberti that her computer that stored the 9/7/16 "COPY TO PATIENT" report with credentials issued to Alberti was compromised.

9. Plaintiff blamed Alberti for the privacy breach.

10. Plaintiff blamed Alberti for a failed root canal.

11. Plaintiff flagged, removed, and hid posts, prior to his attorney issuing Alberti a threat letter demanding posts -- that Plaintiff claims are all false and defamatory posts -- be removed.

MARY KATHERINE ALBERTI

By: /s/ *James K. Borcia*
One of Her Attorneys

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4985-7935-8173